RENE L. VALLADARES 1 Federal Public Defender State Bar No. 11479 2 ANDREW WONG Assistant Federal Public Defender 3 411 E. Bonneville, Ste. 250 Las Vegas, Nevada 89101 4 (702) 388-6577/Phone (702) 388-6261/Fax 5 Andrew Wong@fd.org 6 Attorney for Humberto Guzman-Virgen

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

v.

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HUMBERTO GUZMAN-VIRGEN,

Defendant.

Case No. 2:21-cr-00004-RFB-DJA

## STIPULATION TO CONTINUE CHANGE OF PLEA/SENTENCING HEARING

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Jared Grimmer, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Andrew Wong, Assistant Federal Public Defender, counsel for Humberto Guzman-Virgen, that the Change of Plea/Sentencing Hearing currently scheduled on March 11, 2021 at 3:00 pm, be vacated and continued to a date and time convenient to the Court, but no sooner than seven (7) days.

This Stipulation is entered into for the following reasons:

1. Counsel for the defendant will be in trial on March 8, 2021. Trial is expected to last one week.

1	2. In order to ensure continuity of defense counsel, the parties request that the		
2	change of plea and sentencing be continued to March 18, 2021 or the earliest available date on		
3	the Court's calendar.		
4	3. The defendant is in custody and agrees with the need for the continuance.		
5	4. The parties agree to the continuance.		
6	This is the first request for a continuance of the Change of Plea/Sentencing hearing.		
7	DATED this 4 <sup>th</sup> day of March, 2021.		
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9		ALLADARES blic Defender	CHRISTOPHER CHIOU Acting United States Attorney
10			Acting Office States Attorney
11	By <u>/s/ Andr</u>	ew Wono	By /s/ Jared Grimmer
12	ANDREW	WONG	JARED GRIMMER
13	3 Assistant Federal Public Defender Assis		Assistant United States Attorney
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## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Case No. 2:20-cr-00004-RFB-DJA

Plaintiff,

v.

HUMBERTO GUZMAN-VIRGEN,

Defendant.

**ORDER** 

IT IS THEREFORE ORDERED that the Change of Plea/Sentencing hearing currently scheduled for Thursday, March 11, 2021 at 3:00 p.m., be vacated and continued to March 18, 2021 at the hour of 1:00 p.m.; or to a time and date convenient to the court.

DATED this 4th day of March, 2021.

NOWARD E ROLLINAR

RICHARD F. BOULWARE, II UNITED STATES DISTRICT JUDGE